

DRAFT – July 29, 2008

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v -

The painting know as "Hannibal" by the artist Jean-Michel Basquiat, from 1982, an acrylic, oil stick and paper collage on canvas, mounted on tied wood, approximately 60 x 60 inches with an appraised value of approximately eight million dollars;

The painting known as "Modern Painting with Yellow Interweave" by the artist Roy Lichtenstein, an abstract painting with geometric shapes, including two "half-rings" filled with yellow, with back outlines, and with a black vertical strip dividing the painting in two "halves," signed on the back, with a value of at least approximately one million, three hundred thousand dollars;

The painting known as "Figures dans une structure" [Figures in a structure], by the artist Joaquin Torres-Garcia, signed in the upper left corner, dated in the upper right hand corner, and purchased in 2004 for approximately two hundred thirty thousand dollars;

The painting known as "Composition abstract" [Abstract composition] by the artist Serge Poliakoff, painted in 1969, an oil painting on burlap, with abstract geometric shapes in red, blue, yellow and brown, approximately 162 x 135 centimeters, sold at auction in 2004 for more than three hundred seventy-eight thousand dollars,

Defendants-in-rem.

Case No. 08 Civ. 1511 (RJS)

**NOTICE OF CLAIM**

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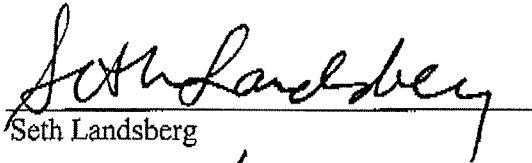
I, SETH LANDSBERG, being duly sworn, say:

1. Property owned by me, namely the painting known as “Modern Painting with Yellow Interweave,” by Roy Lichtenstein, an abstract painting with geometric shapes, including two “half-rings” filled with yellow, with black outlines, and with a black vertical strip dividing the painting in two “halves,” signed on the back, was seized by agents from the Department of Homeland Security, Immigration and Customs Enforcement on July 9, 2008, and the United States Attorney for the Southern District of New York has instituted the above-captioned proceeding seeking to forfeit the painting.

2. I am the owner of “Modern Painting with Yellow Interweave”.

Under the penalties of perjury of the laws of the United States of America, I swear that the foregoing statements are true and correct to the best of my knowledge and belief.

By:

  
Seth Landsberg

DATED: August 14, 2008